

September 1, 2021

VIA CM/ECF

The Hon. James Donato
U.S. District Court for the Northern District of California
San Francisco Courthouse
450 Golden Gate Avenue
San Francisco, CA 94102

Re: *Pars Equality Center v. Pompeo*, No. 18-cv-7818-JD

Dear Judge Donato:

Plaintiffs in the *Pars* matter respectfully submit this letter to provide the Court with a full status update for plaintiffs in this matter.

Defendants' status report, (*Emami* ECF 187), submitted yesterday did not address the status of all plaintiffs in this matter. As to Organizational Plaintiff Pars Equality Center, Plaintiffs include with this letter a declaration detailing the current harms to the Organization and its clients notwithstanding the Muslim Ban's rescission. The attached declaration was prepared to support Plaintiffs' fully drafted brief in support of a motion for summary judgment that will be filed as soon as this matter is no longer stayed. As detailed in the Declaration, Pars Equality Center is experiencing ongoing harms and impacts as it continues to expend resources on clients of the organization who did not receive visas and waivers. As indicated in the attached declaration, the Organization's status regarding the unlawful waiver promulgation remains virtually identical to its status prior to the Ban's rescission.

Respectfully submitted,

/s/ Max S. Wolson

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